

STATE OF LOUISIANA

PARISH OF CADDO

**AFFIDAVIT OF ANDREW D. MARTIN**

BEFORE ME, the undersigned Notary Public, personally came and appeared **Andrew D. Martin**, an individual of lawful age, to me known, who upon being duly sworn, declared as follow:

1.

I am a counsel of record for the Plaintiffs in the matter of *Magnolia Island Plantation, LLC and Barbara Marie Carey Lollar v. Lucky Family, LLC, W.A. Lucky, III, and Bossier Parish Sheriff Julian C. Whittington*, Case Number 5:18-cv-01526 in the United States District Court in the Western District of Louisiana (the “Suit”).

2.

I am submitting this Affidavit in connection with an amended and corrected motion for partial summary judgment filed by Plaintiff Ms. Lollar in this matter (the “Motion”).

3.

I, along with the rest of my office, received discovery responses from counsel for the Bossier Parish Sheriff, a defendant in the Suit, in 2019. Excerpts from these responses, which included an original response and two supplemental responses, are included with the Motion as **Exhibit G in globo**. These discovery responses included document production. That document production is included as **Exhibit B in globo** the Motion, and was received by undersigned via email from the Sheriff’s counsel’s assistant on August 19, 2019 and October 17, 2019. The cover emails for these discovery responses/document production are included herewith as **Exhibit I** to the Motion. The Sheriff’s Office and Ms. Flournoy both claim to have no further relevant documents.

4.

I, along with the rest of my office, received discovery responses from counsel for the W.A. Lucky, III, a defendant in the Suit, in 2019. Excerpts from these responses, included documents produced therewith, are included with the Motion as **Exhibit J in globo**.

5.

Attached as **Exhibit L** to this affidavit is a certain *Ex Parte Motion to Fix Appraisers’ Fees* and signed Order which I personally obtained from the Bossier Parish online suit records on November 11, 2022.

Further Affiant sayeth not.



Andrew D. Martin

SWORN TO AND SUBSCRIBED before me, Notary Public, on this 11 day of November, 2022.



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NOTARY PUBLIC

